## UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

## MOTION TO CONTINUE SENTENCING HEARING FOR 30 DAYS

The Defendant, Robert Corson, through his counsel, respectfully moves this Court to continue the sentencing hearing scheduled for November 7, 2022:

- 1. A sentencing hearing in this matter is scheduled for November 7, 2022. Originally the hearing was scheduled for November 9, 2022.
- 2. The final Presentence Investigation Report (PSIR) was received by counsel on October 24, 2022.
- 3. Undersigned counsel is currently out of state and had originally planned to meet with the Defendant on November 7, 2022, to review the final PSIR.
- 4. It is possible that the Government may agree to some objections filed by the Defendant not adopted in the final PSIR. That determination will require more time and consultation.
- 5. Undersigned counsel spoke with Assistant U. S Attorney, Jennifer Davis, who assents to the relief requested.
- 6. The relief requested is in the discretion of the Court and further memoranda is unnecessary.
- 7. Undersigned counsel has discussed the need for the continuance with the Defendant. The Defendant, after discussion, voluntarily waives his statutory and constitutional rights to a speedy

trial caused by this request for a continuance. A copy is being sent to the Defendant contemporaneously.

Wherefore, the Defendant respectfully moves this Court to continue the sentencing hearing in the above captioned matter for period of 30 days. The dates of December 12, 2022, and December 13, 2022, are available for both counsel.

> Respectfully submitted, Robert Corson, Defendant By and through his counsel, BRENNAN LENEHAN IACOPINO & HICKEY By /s/Michael J. Iacopino Michael J. Iacopino, Esq. (Bar No. 1233)

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## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Motion to Continue Sentencing Hearing has been forwarded to AUSA Jennifer Davis via the ECF System.

Date: November 2, 2022

/s/Michael J. Iacopino Michael J. Iacopino, Esq.